

COLSON LAW

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August 28, 2020

**MEMO ENDORSED**

By ECF

The Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

Re: *U.S. v. Gyancarlos Espinal*, 17 Cr. 791 (LAK)

Dear Judge Kaplan:

Mr. Espinal pled guilty in November 2019 to a two-count indictment charging conspiracy to distribute heroin and conspiracy to commit murder during and in relation to a drug-trafficking crime. He was incarcerated at the Metropolitan Correctional Center and was transferred to the Queens Detention Facility ("GEO") after agreeing to cooperate with the case.

I am writing *Ex Parte* to request that Your Honor sign the attached subpoenas, requesting Mr. Espinal's complete set of BOP records from the Queens Detention Facility and the Metropolitan Correctional Center, including, but not limited to: disciplinary records, educational records, and all records available from past Bureau of Prisons facilities. I believe that these records will provide insight into Mr. Espinal's experience while incarcerated.

I appreciate the Court's consideration.

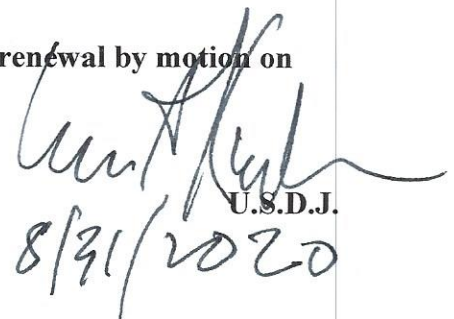
Respectfully submitted,

/s/

Deborah Colson

cc: AUSA Danielle Sassoon

**Denied without prejudice to renewal by motion on notice.**

  
U.S.D.J.  
8/31/2020